

[2011R00420/dvc]

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No. 14- <u>699 (JBS)</u>
v.	:	21 U.S.C. §§ 846 and 853
TOYE TUTIS,	:	18 U.S.C. §§ 1956(a)(1)(A)(i), 1956(a)(1)(B)(i), 1956 (a)(1)(B)(ii), 1956(h) and 982
a/k/a "Ahmad,"	:	
a/k/a "Mahd,"	:	
a/k/a "Santana,"	:	
KAREEM TAYLOR,	:	
a/k/a "K-Love,"	:	
a/k/a "Love,"	:	
IVAN CUELLAR NARANJO,	:	
a/k/a "Fatboy,"	:	
a/k/a "Cirilo Ruiz,"	:	
FRANCISCO ALBERTO	:	
RASCON-MURACAMI,	:	
a/k/a "Francisco Alberto	:	
Rascon-Murakami,"	:	
PHILLIP HORTON,	:	
a/k/a "Phil,"	:	
a/k/a "Doc,"	:	
TOZINE TILLER,	:	
a/k/a "To,"	:	
TALIB TILLER,	:	
KABAKA ATIBA,	:	
RONALD DOUGLAS BYRD,	:	
a/k/a "Doug Byrd,"	:	
JOHN WELLMAN,	:	
a/k/a "Yah-Yah,"	:	
a/k/a "Yah," and	:	
JAZMIN VEGA	:	

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INDICTMENT

COUNT 1 – Drug Trafficking Conspiracy
(21 U.S.C. § 846)

The Grand Jury in and for the District of New Jersey, sitting at Camden, charges:

From in or about February 2012 through on or about December 10, 2014, in

Atlantic County, in the District of New Jersey and elsewhere, defendants

TOYE TUTIS, a/k/a "Ahmad," a/k/a "Mahd," a/k/a "Santana,"
KAREEM TAYLOR, a/k/a "K-Love," a/k/a "Love,"
IVAN CUELLAR NARANJA, a/k/a "Fatboy," a/k/a "Cirilo Ruiz,"
FRANCISCO ALBERTO RASCON-MURACAMI,
a/k/a "Francisco Alberto Rascon-Murakami,"
PHILLIP HORTON, a/k/a "Phil," a/k/a "Doc,"
TOZINE TILLER, a/k/a "To,"
TALIB TILLER,
KABAKA ATIBA,
RONALD DOUGLAS BYRD, a/k/a "Doug Byrd," and
JOHN WELLMAN, a/k/a "Yah-Yah," a/k/a "Yah,"

did knowingly and intentionally conspire and agree with each other and others to distribute and to possess with intent to distribute: (1) five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A); (2) 280 grams or more of a mixture and substance containing a detectable amount of cocaine base, that is, crack cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A); and (3) one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

In violation of Title 21, United States Code, Section 846.

COUNT 2 – Money Laundering Conspiracy
(18 U.S.C. § 1956(h))

From in or about February 23, 2010, through in or about December 10, 2014, in Atlantic County, in the District of New Jersey, and elsewhere, defendants

TOYE TUTIS, a/k/a “Ahmad,” a/k/a “Mahd,” a/k/a “Santana,” and
JAZMIN VEGA,

knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, namely, drug trafficking, and (A) with the intent to promote the carrying on of a specified unlawful activity, and (B) knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and (C) knowing that the transactions were designed in whole and in part to avoid a transaction reporting requirement under State or Federal law, did knowingly and willfully conspire and agree with each other and others to conduct financial transactions affecting interstate and foreign commerce which in fact involved the proceeds of specified unlawful activity, specifically the transfer, delivery, and other disposition of United States currency that was the proceeds of the distribution of narcotics, contrary to Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i) and 1956(a)(1)(B)(ii).

All in violation of Title 18, United States Code, Section 1956(h).

FIRST FORFEITURE ALLEGATION

The Grand Jury realleges and incorporates by reference the allegations contained in this Indictment for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 982. As the result of committing the money laundering offense in violation of Title 18, United States Code, Section 1956, alleged in Count 2 of this Indictment, defendants TOYE TUTIS, a/k/a "Ahmad," a/k/a "Mahd," a/k/a "Santana," and JAZMIN VEGA shall forfeit to the United States pursuant to Title 18, United States Code, Section 982, all property, real and personal, involved in the money laundering offense and all property traceable to such property, including but not limited to the following:

1. BANK ACCOUNTS

- a) All United States currency funds or other monetary instruments credited to account number 3810-2352-3115 in the name of Ta'Ja Construction I, LLC, located at Bank of America;
- b) All United States currency funds or other monetary instruments credited to account number 3810-2352-3102 in the name of Ta'Ja Real Estate Investors LLC, located at Bank of America; and
- c) All United States currency funds or other monetary instruments credited to account number 3810-2352-3128 in the name of Integrity Heating and Cooling Inc. located at Bank of America.

2. REAL PROPERTY

- a) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 411 Montclaire Drive, Pleasantville, New Jersey 08232, more particularly described as: Block 323, Lot 23 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey; and

b) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 18 W. Park Avenue, Pleasantville, New Jersey 08232, more particularly described as: Block 360, Lot 4 on the tax map of the City of Pleasantville, County of Atlantic, State of New Jersey;

If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section § 982(b), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property all in violation of Title 18, United States Code, Sections 982 and 1956.

SECOND FORFEITURE ALLEGATION

The Grand Jury realleges and incorporates by reference the allegations contained in this Indictment for the purpose of noticing forfeiture pursuant to Title 21, United States Code, Section 853. As a result of committing the controlled substance offense alleged in Count 1 of this indictment, defendants TOYE TUTIS, a/k/a "Ahmad," a/k/a "Mahd," a/k/a "Santana," and JAZMIN VEGA shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the said defendants obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count 1 of this Indictment, including but not limited to the following:

1. BANK ACCOUNTS

- a) All United States currency funds or other monetary instruments credited to account number 3810-2352-3115 in the name of Ta'Ja Construction I, LLC, located at Bank of America;
- b) All United States currency funds or other monetary instruments credited to account number 3810-2352-3102 in the name of Ta'Ja Real Estate Investors LLC, located at Bank of America; and
- c) All United States currency funds or other monetary instruments credited to account number 3810-2352-3128 in the name of Integrity Heating and Cooling Inc., located at Bank of America.

2. REAL PROPERTY

- a) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 411 Montclare Drive, Pleasantville, New Jersey 08232, more particularly described as: Block 323, Lot 23 on the tax

map of the City of Pleasantville, County of Atlantic, State of New Jersey;

- b) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1929 Blaine Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 493, Lot 2 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey;
- c) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 606 Alpine Court, Mays Landing, New Jersey 08330, more particularly described as: Block 996, Lot 7-C-1006 on the tax map of the Town of Mays Landing, County of Atlantic, State of New Jersey;
- d) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1011 Arctic Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 314, Lot 19 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey;
- e) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1629 W. Toronto Street, Philadelphia, Pennsylvania 19132, more particularly described as: Parcel ID #: 111102400 on the tax map of the City of Philadelphia, County of Philadelphia, State of Pennsylvania;
- f) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1009 Arctic Avenue, Atlantic City, New Jersey 08401, more particularly described as: Block 314, Lot 18 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey; and
- g) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 928 Arctic Avenue, Atlantic City,

New Jersey 08401, more particularly described as: Block 301, Lot 1 on the tax map of the City of Atlantic City, County of Atlantic, State of New Jersey.

If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property all in violation of Title 21, United States Code, Sections 841(a)(1) and 853.

A TRUE BILL

FOREPERSON

Paul J. Fishman
PAUL J. FISHMAN
United States Attorney

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JAZMIN VEGA

INDICTMENT FOR
21 U.S.C. §§ 846 & 853
18 U.S.C. §§ 1956(a), 1956 (h) & 982

PAUL J. FISHMAN
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